333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

W. R. Woodall, Jr.
Manager
Environmental Affairs

attachment 1

6/17/86
Current Form 2C pages 1-9; V-1 thru V-9 for 03, all schematics

May 5, 1986

PLANT SCHERER
NPDES Permit N. Ga. 0035564

Mr. David M. Word
Assistant Branch Chief
Water Protection Branch
Environmental Protection Division
Floyd Towers East, Room 1070
205 Butler Street, S.E.
Atlanta, Georgia 30334

Dear Mr. Word:

Reference is made to the Plant Scherer Draft NPDES Permit issued by your office on October 22, 1985.

As a result of comments issued by EPA and discsussions with you and your staff, attached are revised pages of the permit application, updated water balance and site diagrams, and chemical analyses of discharge number 03 for your incorporation into the draft permit. Please note that the revised permit information includes discharges for all four units. Unit 3 is scheduled for start-up in October 1986, with commercial operation due to begin in January 1987. Unit 4 is scheduled for operation in 1989.

In addition, we offer the attached comments on the draft permit. If you have any further questions or comments, please advise.

Yours very truly,

W. R. Woodall, Jr.

GNG:mp
Attachments

Draft NPDES Permit No. GA0035564
Part IIIB(4) and 40 CFR 423.13(d)(2)

Discussion of Plant Scherer chlorination programs for control of Corbicula and other biofouling in the plant service water and cooling water systems

When completed, Plant Scherer will be composed of four generating units with a combined nameplate rating of 3,272 MW. Units 1 and 2 are currently in commercial operation. Unit 3 is scheduled for initial operations in October 1986, with commercial operation to begin on January 1, 1987. Unit 4 will begin commercial operation in 1989. Cooling water and service water for all four units is provided by a manmade service water storage pond (Lake Juliette) and all four units utilize closed cycle cooling with natural draft cooling towers.

As explained in our letter of October 8, 1984, (copy attached for your reference), Georgia Power believes that a Corbicula control program utilizing chlorine at Plant Scherer is essential for reliable plant operation. Chlorination for Corbicula control would generally occur from April through October, depending on intake water temperatures. Chlorine would be applied continuously at the plant service water intake pumps to maintain a 1.0 ppm residual in all plant service water systems. Since cooling tower make-up water for all units is taken from the plant service water system simultaneous chlorination of the cooling towers of all operational units would occur due to the presence of chlorine residuals in the service water system over the 5 day period. This long term chlorination of the service water is needed to control the occurance of the clams in the service water systems.

Normal biofouling control for the cooling tower systems average 2 to 3 hours per day per unit throughout the year. With two units in operation at present, each unit can be chlorinated sequentially but such practice requires the attention of plant personnel over a longer period of time (4 to 6 hours per day). When all four units come into operation, sequential chlorination would require 12 to 14 hours per day to accomplish, and would require the hiring of additional personnel to conduct the chlorination over the extended time period. Simultaneous chlorination of four units could be accomplished in 2 to 4 hours with no additional personnel requirements. Simultaneous chlorination would thus result in a net cost savings to the Company as well as allowing operating flexibility.

The discussion of cooling tower blowdown in the Preamble to the 1982 Steam Electric Guidelines states that "The major technology options for this wastestream are dechlorination, chemical substitution, and chemical precipitation" (FR, Vol. 47, Friday, November 19, 1982, p.52295). It is Georgia Power's intent to install and operate a common dechlorination facility to treat the combined blowdown from Units 1 - 4 (OSN-01A) and also to install and operate a dechlorination facility downstream of the minimum flow lines in the service water final discharge to Lake Juliette (OSN-03). Simultaneous operation of these dechlorination facilities during the Corbicula control program and during normal cooling water chlorination will insure that effluent limits of 0.2/0.5 mg/l FAC can be achieved at both outfalls. Although the FAC effluent limits of 0.2/0.5 mg/l will be achieved, the time of TRC discharge may exceed the 2 hour per day per unit limitation during periods of chlorination for Corbicula control.

We propose to institute a monitoring program to insure that the installed dechlorination facilities are operating properly and that chlorine effluent limitations are being met at the defined discharge locations. Dechlorination facilities would be operated simultaneously with the chlorinators and samples for FAC and TRC would be taken according to the following schedule.

During periods of chlorination for Corbicula control, samples would be taken once per day immediately following the dechlorination facilities for both OSN-01A and OSN-03 and analyzed for FAC and TRC. Following discontinuance of chlorination activities the cooling tower blowdown and service water return would be monitored for chlorine. When FAC and TRC residuals were less than 0.2 mg/l, dechlorination would be discontinued and a sample taken past the dechlorination facility to insure that FAC and TRC residuals met acceptable criteria.

During the once per week periods of normal service water and cooling tower chlorination, a sample would be taken immediately following the dechlorination facilities for the system or systems being chlorinated at the time, and analyzed for FAC and TRC to insure proper operation of the dechlorination equipment. Following discontinuance of chlorination, the system or systems would be monitored upstream of the dechlorination facility until FAC and TRC residuals were less than 0.2 mg/l. Dechlorination would then be discontinued and a sample taken downstream of the dechlorination equipment to insure FAC and TRC residuals were less than 0.2 mg/l.

Results of analyses performed on permitted discharges will be reported in the Operations Monitoring Report.

The dechlorination unit for the combined cooling tower blowdown for Units 1-4 (01A) is on site and engineering work for its installation has begun. Engineering for the dechlorination unit for discharge 03 has also begun and the unit will be acquired when the specifications have been developed. We anticipate having both systems installed and fully operational within the next 18 months. The dechlorination unit for the cooling tower blowdown will be placed in service with either temporary or permanent piping prior to the start-up of Unit 3 in October 1986. Until this dechlorination facility is operational we plan to chlorinate Units 1 and 2 sequentially with the blowdown valves closed.

Once the 01A dechlorinator is installed we plan to begin the chlorination programs described above. The cooling towers would be simultaneously chlorinated and the blowdowns dechlorinated.

Chlorination for Corbicula control will not begin until the dechlorination unit for discharge 03 is installed and operational. Normal service water chlorination will be accomplished by closing the 03A and 03B discharges and diverting all chlorinated service water to the Units 1 and 2 cooling towers. This action will prevent the discharge of FAC or TRC from outfall 03. This service water chlorination procedure will be used only until the dechlorination unit is operational due to the lack of control of cooling tower water chemistry and the resulting detrimental effects on the tower fill material. The FAC and TRC discharges resulting from this normal service water chlorination will be controlled by the dechlorination facility at discharge 01A, cooling tower blowdown.

EPA CONCERNS:

EPA addressed the heat component of the service water discharge (03) in their comments on the October 22, 1985, Draft Permit. Because this service water system services auxillary heat exchangers and other miscellaneous non-contact cooling equipment, we do not expect a significant temperature rise at the discharge. Currently Units 1 and 2 are operating on a peak load basis and simultaneous operation of both units at near maximum capacity may not occur until this summer. We propose to conduct a one time demonstration to verify that our 03 discharge is within State water quality standards. This demonstration would be conducted at the earliest possible time when both Units 1 and 2 were operating at near maximum load. Temperature profiles would be taken in Lake Juliette at locations near the dischage point at 1 meter increments from the surface to the bottom. This data would then be submitted for your consideration as to the necessity for further temperature monitoring of this discharge. This demonstration could be included as a special condition of the permit.

Specific comments - draft permit

A. page 4 of 19, 01B Ash Transport Water and page 5 of 19, 02J Settling Pond Emergency Overflow

Georgia Power Company objects in principle to the use of EPA's Guidance for NPDES Permits Issued to Steam Electric Power Plants, dated August 22, 1985. This is a guidance document only, which has not been issued through appropriate Administrative Rulemaking Procedures, and therefore is not binding on the State Environmental Protection Division. Georgia Power also disagrees with specific portions of the Guidance Document, much of its methodology, and with portions of the EPA's comments, dated October 22, 1985, on the Plant Scherer Draft NPDES Permit.

EPA has encouraged the use of centralized, combined treatment systems in the electric utility industry. As EPA's 1980 Steam Electric Development Document says:

> "Consolidation of wastestreams to a centralized treatment system is permitted and encouraged."

Also, the 1974 Preamble to the steam electric guidelines says:

> It is also recognized by EPA that due to the economies of scale, combining similar waste streams for treatment to remove the same pollutants is generally less costly than separate treatment of these waste streams. The employment of cost saving alternatives in meeting the effluent limitations should not be discouraged.

Such co-treatment of similar waste streams is now standard practice at all Georgia Power Company coal fired steam-electric generating plants, utilizing the ash pond as the treatment unit in most instances.

EPA's Guidance Document and recent comments on the draft permit now seem to attempt to penalize the plants where co-treatment is utilized by considering rainfall related flows as dilution water and allowing no credit for suspended solids (TSS) and oil and grease that might be present in these streams.

One major rainfall related waste stream involved in these guidelines is coal pile runoff. The Guidance Document states that the limitations for coal pile runoff is an instantenous 50 mg/l for TSS and no allowance for oil and grease for flows directed to an ash pond. Our interpretation of the Steam Electric Guidelines is that this limitation applies only to a "point source discharge" to waters of the U.S. In this context then, coal pile runoff effluent can be directly discharged to waters of the U.S. as long as the 50 mg/l maximum TSS is met and with no limitations on oil and grease. Routing of this effluent to and ash pond however, is not a "point source discharge" as

defined by the Steam Electric Guidelines and therefore is not regulated for TSS and oil and grease. Although EPA's comments of October 22, 1985, suggest a BPJ limit on coal pile runoff of 30/30 mg/l as both daily maximum and daily average, we contend that coal pile runoff is unregulated for the TSS during the averaging times at issue in the combined waste streams calculations (24 hour retention time in the ash pond). Thus, the utility combined waste stream rule does not apply to coal pile runoff. We further contend that the 30/100 TSS limits afforded other regulated streams are appropriate when coal pile runoff is routed to an ash pond since available ash pond effluent data in the guidelines record shows that the appropriate level of treatment which coal pile runoff gets when it is routed to an ash pond is 30/100 mg/l. This conclusion also applies to oil and grease limits for coal pile runoff to an ash pond. There are no effluent guidelines limits on oil and grease for coal pile runoff, and the standard 15/20 mg/l limits reflect ash pond treatment capabilities for these pollutants.. Any lower limits would be unreasonable since, if the runoff were not routed to an ash pond, it could be discharged untreated for oil and grease.

Likewise, other unregulated, rainfall related flows that are directed to an ash pond should qualify as low volume wastes under Section 423.11(b) since no categorical limits have been set for them. As such they would be allowed limits on TSS of 30/100 mg/l and 15/20 mg/l for oil and grease.

Georgia Power is strongly of the view that complex regulatory action on rainfall related streams is needless and provides little, if any, environmental protection. Application of limits of 30/100 mg/l for TSS and 15/20 mg/l for oil and grease to all rainfall related waste streams directed to an ash pond will greatly simplify permit issuance and enforcement, will allow for utility operating flexibility, and will afford adequate protection to waters of the U.S. which ultimately receive ash pond discharges.

In the event that the Environmental Protection Division intends to proceed with the use of the EPA Guidance Document, Georgia Power believes that the volume retention test for and ash pond should be used as a screening device only, and that we should be allowed to make a case-by-case demonstration of ash pond efficiency in meeting rainfall conditions in the event that any ash pond does not pass the retention volume test. We also believe that in the event of a volume test failure and/or a failure of a case-by-case demonstration that we should be allowed demonstrated or BPJ cretits for actual TSS and oil and grease in all rainfall related, or other unregulated, streams directed to an ash pond, instead of receiving zero credit.

As stated above, Georgia Power Company does not concur with the application of EPA' Guidance Document or its methodology, however, the following comments on Plant Scherer's ash pond are provided for EPD's consideration in the event that the methodology in the Guidance Document is applied to this permit.

Because of comments made by Mr. John T. Marlar, Chief, Facilities Performance Branch, EPA Region IV, on the draft NPDES permit, a mass balance of the Plant Scherer Ash Pond system was estimated by EPD assuming a volume test failure of the pond, and thus including wet weather flows into the calculations.

We now have had time to gather additional information on the ash pond system which demonstrates that the ash pond will pass the storage volume test as described in the EPA Guidance Document. Plant Scherer's ash pond has no significant drainage area and was designed for probable maximum precipitation (PMP) on the pond, the small tributary drainage area, and the maximum ash water inflow from the plant. The surface area of the ash pond is approximately 490 acres with the top of the dam at 505 ft MSL and the PMP elevation is 504 ft MSL. For normal operation a drop inlet spillway with crest elevation at 494.5 ft MSL and discharge capacity based on a 100 year flood has been provided. Normal operating pond level is 495 ft MSL.

It has been estimated that four unit operation at Plant Scherer will produce approximately 640 AF of ash per year. With available storage at full pond, elevation 495.0, of 16,000 AF, the ash pond has a life of approximately 25 years.

Using 160 AF of ash deposited per year per unit (640 AF for 4 units), and the length of time each unit will have been in operation in 1991 (assuming a 5 year permit issued in 1986), approximately 3110 AF of ash will have been deposited in the pond by 1991. At normal pond elevation (495.0) this leaves 12,890 AF for storage capacity available in 1991. The additional storage volume in the settling pond before the emergency overflow is reached is 5600 AF.

The EPD mass balance figures show input into the ash pond to be 71.08 MGD. No significant unregulated, uncontaminated dry weather flows enter the ash pond. This 71.08 MG is equivalent to 218.2 AF required to meet the volume storage test as defined by the EPA at permit expiration. The pond will have 12,890 AF available as described above. Therefore the volume test is passed and only dry weather flows should be included in the mass balance calculations. Since the only dry weather flows entering the pond are Ash Transport Water and Low Volume Wastes, both regulated for 30/100 TSS and 15/20 O&G, combined effluent limitations for the two discharges, OSN-01B and OSN-02J, should remain at the maximum allowable of 30/100 TSS and 15/20 O&G.

B. page 5 of 19, 02J Settling Pond Emergency Overflow to Lake Juliette (Ash Transport Water)

Footnote (1) should include pH monitoring only when a discharge is occuring

C. page 6 of 19, 02K Wastewater Basin Emergency Overflow to Lake Juliette (Low Volume Wastes)

Footnote (1) should include pH monitoring only when a discharge is occuring

D. page 9 of 19, 06 Service Water Storage Pond (Lake Juliette) Discharge to Rum Creek

This discharge should be eliminated because of limits to be placed on OSN-03, Service Water Return Line

E. page 18 of 19, Special Condition B3

The requirement for pH in the range of 6.0 to 9.0 standard units should be deleted for the following reasons:

1) 40 CFR 122.2 defines "Discharge when used without qualification means the 'discharge of a pollutant'"

"Discharge of a pollutant means: (a) Any addition of any 'pollutant' or combination of pollutants to 'waters of the United States' from any 'point source' or . . ."

2) 40 CFR 423.12(b)(1) states: "The pH of all discharges, except once through cooling water, shall be within the range of 6.0 -9.0."

3) 40 CFR 423.12(b)(5) does not list a limitation for pH for metal cleaning wastes

Since flows from our metals cleaning ponds to the Unit 1 & 2 Waste Water Retention Basin do not constitute a "discharge" to "waters of the United States", such flows are an internal waste stream that can benefit from further neutralization for pH by combining with other waste streams. Such neutralization for pH is accepted technology.

Monitoring the final plant discharge from the Detention Pond (I-Pond) is currently regulated for pH for the range 6.0 to 9.0. This "point source discharge" is sufficient to protect "Waters of the United States" while allowing the Company the benifit of neutralization for pH within its internal treatment units.

Georgia Power Company
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Post Office Box 4545
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Georgia Power

Power Supply Engineering and Services

October 8, 1984

PLANT SCHERER
Control of Asiatic Clams (Corbicula fluminea)

Mr. Gene B. Welsh, Chief
Water Protection Branch
Environmental Protection Division
270 Washington Street, S. W.
Atlanta, Georgia 30334

Dear Mr. Welsh:

The Asiatic Clam (Corbicula fluminea) has been found in the Ocmulgee River near our Plant Scherer, as well as in our service water storage pond (Lake Juliette). As you may know, this pest organism can, and has, caused many problems for the electric power industry. It has been responsible for plugging of heat exchanger tubes, cooling water lines, and many other related plant water systems nationwide, as well as in other Georgia Power operating plants.

Chlorine is the only currently EPA approved moluscicide and is in wide usage for clam control. Unfortunately, Corbicula are quite resistant to chlorine and high residuals over prolonged periods of time are required to help control them.

Due to the presence of Corbicula in our service water storage pond at Plant Scherer, we request your concurrence on a program to help control the occurrence of Corbicula in vital plant water systems. We wish to chlorinate the general service water at a rate of 1.0 PPM free available chlorine (FAC), as measured at the exit from the main heat exchangers. Chlorine would be applied at this rate five (5) days per month for 24 hours per day.

This chlorination program would be conducted in conjunction with the addition of chemicals to the cooling towers which would increase the cycles of concentration from two (2) to six (6) to seven (7); (reference our letter to Mr. David M. Word, dated August 3, 1984, on the use of Nalco Sure-Cool 1332). This procedure would result in the discharge of 7000 GPM per unit at a chlorine concentration of approximately 1.0 PPM FAC.

The discharge would be back to the service water storage pond (Lake Juliette) through the minimum flow lines or the cooling water recycle lines (reference our letter dated October 4, 1984 concerning NPDES discharges).

We believe that this program is necessary to help insure the reliable operation of Plant Scherer by reducing the chances of forced outages due to fouling of vital water systems by Corbicula.

Please advise if you have questions or comments concerning this request.

Yours very truly,

W. R. Woodall, Jr.
Manager of Environmental Affairs

GNG:pd

FORM 2C NPDES

EPA

U.S. ENVIRONMENTAL PROTECTIO. GENCY
APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER
EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURAL OPERATIONS
Consolidated Permits Program

I. OUTFALL LOCATION

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

A. OUTFALL NUMBER (list)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (name)
	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	
01	33	03	06	83	48	29	Ocmulgee River via Berry Creek
02	33	03	06	83	48	29	and Plant Scherer Service Water Storage
03	33	03	06	83	48	29	Pond (Lake Juilette)
04	33	03	06	83	48	29	Ditto -
05	33	03	06	83	48	29	Ditto -
06, 07	33	03	06	83	48	29	

RECEIVED
MAY 5 1986
ENVIRONMENTAL PROTECTION DIVISION
NATURAL RESOURCES

II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES

A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined *(e.g. for certain mining activities)*, provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

1. OUTFALL NO. (list)	2. OPERATION(S) CONTRIBUTING FLOW		3. TREATMENT		
	a. OPERATION (list)	b. AVERAGE FLOW (include units)	a. DESCRIPTION	b. LIST CODES FROM TABLE 2C-1	
01	Detention Pond (I-Pond)	38,855 gpm			4A
	Final Discharge to Berry Creek				
	01A Cooling Tower Blowdown	(Unit 1-4) 31,540 gpm		**2E,**2F	4A
	01B Ash Transport Water	9,300 gpm			4A
	Bleedoff				
	01C Concrete Batch Plant	25 gpm*			4A
	01D I-Pond Bottom Drain	*			
02	Ash Transport Water	45,390 gpm			4A
	02A Main Sewage Treatment Plant	120 gpm		2F	4A
	02B Coal Handling Sewage Treatment Plant	17 gpm		2F	4A
	02C Unit 1 Temporary Sewage Treatment Plant	17 gpm		2F	4A
	02D Unit 2 Temporary Sewage Treatment Plant	17		2F	4A
	02E Coal Pile Runoff Basin	2,500 gpm			4A
	02F Tractor Garage	300 gpm			4A
	02G Coal Pile Runoff *				4A
	02H Waste Water Basin(Units 1-4)	8,200 gpm			4A
	02I Low Volume Wastes(Units 1-4)	2,000 gpm			4A
	02J Settling Pond Emerg.Overflow*				4A
	02K Waste Water Basin Emerg. Overflow (Units 1&2)				4A
	02L Waste Water Basin Emerg. Overflow (Units 3&4)				4A

OFFICIAL USE ONLY *(effluent guidelines sub-categories)*

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☐ YES *(complete the following table)* ☐ NO *(go to Section III)*

1. OUTFALL NUMBER *(list)*	2. OPERATION(s) CONTRIBUTING FLOW *(list)*	3. FREQUENCY		4. FLOW				
		a. DAYS PER WEEK *(specify average)*	b. MONTHS PER YEAR *(specify average)*	a. FLOW RATE *(in mgd)*		b. TOTAL VOLUME *(specify with units)*		c. DURATION *(in days)*
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY	

III. MAXIMUM PRODUCTION

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☐ YES *(complete Item III-B)* ☐ NO *(to to Section IV)*

B. Are the limitations in the applicable effluent guideline expressed in terms of production *(or other measure of operation)*?

☐ YES *(complete Item III-C)* ☐ NO *(go to Section IV)*

C. If you answered "Yes" to Item III-B, list the quantity which represents an actual measurement of your maximum level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. MAXIMUM QUANTITY			2. AFFECTED OUTFALLS *(list outfall numbers)*
a. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. *(specify)*	

IV. IMPROVEMENTS

A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES *(complete the following table)* ☐ NO *(go to Item IV-B)*

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
	a. NO.	b. SOURCE OF DISCHARGE		a. REQUIRED	b. PROJECTED

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs *(or other environmental projects which may affect your discharges)* you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction. ☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

Approval expires 3-31-84

FORM 2C NPDES

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER
EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURAL OPERATIONS
Consolidated Permits Program

I. OUTFALL LOCATION

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

A. OUTFALL NUMBER (list)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (name)
	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	

II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES

A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined *(e.g., for certain mining activities)*, provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

1. OUTFALL NO. (list)	2. OPERATION(S) CONTRIBUTING FLOW		3. TREATMENT	
	a. OPERATION (list)	b. AVERAGE FLOW (include units)	a. DESCRIPTION	b. LIST CODES FROM TABLE 2C-1
03	Service Water Final Discharge	7,000 gpm/Unit ***		**2E, **2F 4A
	03A Serv.Water Return Line to Water Storage Pond - Lake Juliette	42,900 gpm***		*2E, **2F 4A
	03B Minimum Flow Lines	4,600 gpm***		4A
04	Discharge to Service Water Storage Pond (Lake Juliette) Service Water Return Unit 1 Cooling Tower Basin Overflow/Basin Cleaning Wastes to Lake Juliette*	100 gpm		**2F 4A
05	Unit 2 Cooling Tower Basin Overflow/Basin Cleaning Wastes to Lake Juliette*	100 gpm		**2F 4A
06	Unit 3 Cooling Tower Basin Overflow/Basin Cleaning Wastes to I-Pond *	100 gpm		**2E 4A **2F
07	Unit 4 Cooling Tower Basin Overflow/Basin Cleaning Wastes to I-Pond*	100 gpm		**2E **2F

* Intermittant Discharge
** During Periods of Chlorination
*** Deptending on plant requirements

OFFICIAL USE ONLY *(effluent guidelines sub-categories)*

CONTINUED FROM THE FRONT

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☐ YES *(complete the following table)* ☐ NO *(go to Section III)*

1. OUTFALL NUMBER *(list)*	2. OPERATION(s) CONTRIBUTING FLOW *(list)*	3. FREQUENCY		4. FLOW				
		a. DAYS PER WEEK *(specify average)*	b. MONTHS PER YEAR *(specify average)*	a. FLOW RATE *(in mgd)*		b. TOTAL VOLUME *(specify with units)*		c. DURATION *(in days)*
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY	
01C	Concrete Batch Plant	25 GPM Depends on availability of off-site concrete for remainder of construction.						
01D	I-Pond Bottom Drain	Contents of Pond-Emergency Maintenance Use Only.						
04	Unit 1 Cooling Tower Basin Cleaning Wastes	Tower drained for cleaning twice per year.						
05	Unit 2 Cooling Tower Basin Cleaning Wastes	Ditto -						
06	Unit 3 Cooling Tower Basin Cleaning Wastes	Ditto -						
07	Unit 4 Cooling Tower Basin Cleaning Wastes	Ditto -						

III. MAXIMUM PRODUCTION

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☒ YES *(complete Item III-B)* ☐ NO *(to to Section IV)*

B. Are the limitations in the applicable effluent guideline expressed in terms of production *(or other measure of operation)*?

☐ YES *(complete Item III-C)* ☒ NO *(go to Section IV)*

C. If you answered "Yes" to Item III-B, list the quantity which represents an actual measurement of your maximum level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. MAXIMUM QUANTITY			2. AFFECTED OUTFALLS *(list outfall numbers)*
a. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. *(specify)*	

IV. IMPROVEMENTS

A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES *(complete the following table)* ☒ NO *(go to Item IV-B)*

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
	a. NO.	b. SOURCE OF DISCHARGE		a. REQUIRED	b. PROJECTED

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs *(or other environmental projects which may affect your discharges)* you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual planned schedules for construction. ☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

CONTINUE ON PAGE

ASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of nformation on separate sheets *(use the same format)* instead of completing these pages. INSTRUCTIONS.

EPA I.D. NUMBER *(copy from Item 1 of Form 1)*

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OMB No. 2000-0059
Approval expires 3-31-84

INTAKE AND EFFLUENT CHARACTERISTICS *(continued from page 3 of Form 2-C)*

OUTFALL NO. 03

RT A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

OLLUTANT	2. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	a. MAXIMUM DAILY VALUE (2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	c. LONG TERM AVRG. VALUE (if available) (2) MASS	d. NO. OF ANALYSES	3. UNITS (specify if blank) a. CONCENTRATION	3. UNITS b. MASS	4. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	4. INTAKE (optional) a. LONG TERM AVERAGE VALUE (2) MASS	4. INTAKE (optional) b. NO. OF ANALYSES
iochemical gen Demand D)	1.5						1	mg/l				
hemical gen Demand D)	7.6						1	mg/l				
al Organic (TOC)												
otal Suspended ds (TSS)	1.9						1	mg/l				
mmonia (as N)	< 0.02						1	mg/l				
ow	VALUE 42,900 gpm max		VALUE		VALUE					VALUE		
emperature ter)	VALUE		VALUE		VALUE			°C		VALUE		
emperature mer)	VALUE		VALUE		VALUE			°C		VALUE		
	MINIMUM 7.17	MAXIMUM	MINIMUM	MAXIMUM			1	STANDARD UNITS				

RT B - Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2-a for any pollutant, you must provide the results of at least one analysis for that pollutant. Complete one table for each outfall. See the instructions for additional details and requirements.

LLUTANT AND AS NO. *available)*	2. MARK 'X' a. BELIEVED PRESENT	2. MARK 'X' b. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	a. MAXIMUM DAILY VALUE (2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	c. LONG TERM AVRG. VALUE (if available) (2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	4. UNITS b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (2) MASS	5. INTAKE (optional) b. NO. OF ANALYSES
romide 959-67-9)		X												
hlorine, al Residual														
olor														
ecal form			0						1	col/100ml				
luoride 984-48-8)		X												
itrate– ite *(as N)*	X		< 0.2						1	mg/l				

A Form 3510-2C (Rev. 12-80)

CONTINUE ON REVERSE

ITEM V-B CONTINUED FROM FRONT

1. POLLUTANT AND CAS NO. (if available)	2. MARK 'X' a. BELIEVED PRESENT	2. MARK 'X' b. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	3. EFFLUENT a. MAXIMUM DAILY VALUE (2) MASS	3. EFFLUENT b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	3. EFFLUENT b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	3. EFFLUENT c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	3. EFFLUENT c. LONG TERM AVRG. VALUE (if available) (2) MASS	3. EFFLUENT d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	4. UNITS b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (2) MASS	5. INTAKE (optional) b. NO. OF ANALYSES
Nitrogen, otal Organic s N)														
Oil and rease			< 5						1	mg/l				
Phosphorus s P), Total 723-14-0)			0.044						1	mg/l				
Radioactivity														
) Alpha, otal		X												
) Beta, otal		X												
Radium,		X												
) Radium 6, Total		X												
Sulfate s SO_4) 4808-79-8)		X												
Sulfide s S)		X												
Sulfite s SO_3) 4265-45-3)		X												
Surfactants		X												
Aluminum, otal 429-90-5)		X												
Barium, otal 440-39-3)		X												
Boron, otal 0-42-8)		X												
Cobalt, otal 440-48-4)		X												
Iron, Total 439-89-6)			0.15											
Magnesium, otal 439-95-4)			3.04											
Molybdenum, otal 439-98-7)		X												
Manganese, otal 439-96-5)			< 0.1											
Tin, Total 440-31-5)			< 0.1											
Titanium, otal 440-32-6)		X												

EPA I.D. NUMBER (copy from Item 1 of Form 1)	OUTFALL NUMBER
	03

Form Approved
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Approval expires 3-31-84

TINUED FROM PAGE 3 OF FORM 2-C

RT C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a *(secondary industries, non-process wastewater outfalls, and non-required GC/MS fractions)*, mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe to be absent. If you mark either columns 2-a or 2-b for any pollutant, you must provide the results of at least one analysis for that pollutant. Note that there are seven pages to this part; please review each carefully. Complete one table *(all seven pages)* for each outfall. See instructions for additional details and requirements.

OLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE (1) CONCENTRATION	a. MAXIMUM DAILY VALUE (2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	c. LONG TERM AVRG. VALUE (if available) (2) MASS	d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	a. LONG TERM AVERAGE VALUE (2) MASS	b. NO. OF ANALYSES
ALS, CYANIDE, AND TOTAL PHENOLS															
Antimony, 7440-36-0)			X												
Arsenic, Total 0-38-2)			X												
Beryllium, l, 7440-41-7)			X												
Cadmium, l (7440-43-9)			X												
Chromium, l (7440-47-3)				<0.1						1	mg/l				
Copper, Total 0-50-8)				<0.1						1	mg/l				
Lead, Total 9-97-6)				<0.01						1	mg/l				
Mercury, Total 9-97-6)				<0.001						1	mg/l				
Nickel, Total 0-02-0)				<0.1						1	mg/l				
. Selenium, l (7782-49-2)			X												
. Silver, Total 0-22-4)			X												
. Thallium, l (7440-28-0)			X												
. Zinc, Total 0-66-6)				<0.1						1	mg/l				
. Cyanide, l (57-12-5)			X												
l. Phenols, l			X												
XIN															
7,3-Tetra- rodibenzo-P- xin (1764-01-6)			X	DESCRIBE RESULTS											

NTINUED FROM THE FRONT

POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
/MS FRACTION – VOLATILE COMPOUNDS															
. Acrolein)7-02-8)			X												
. Acrylonitrile)7-13-1)			X												
. Benzene -43-2)			X												
. Bis (*Chloro-thyl*) Ether 2-88-1)			X												
. Bromoform -25-2)			X												
Carbon hloride -5)			X												
. Chlorobenzene 8-90-7)			X												
. Chlorodi-momethane 4-48-1)			X												
. Chloroethane -00-3)			X												
/. 2-Chloro-ylvinyl Ether 0-75-8)			X												
/. Chloroform -66-3)			X												
/. Dichloro-momethane -27-4)			X												
/. Dichloro-uoromethane -71-8)			X												
/. 1,1-Dichloro- (75-34-3)			X												
/. 1,2-Dichloro-ane (107-06-2)			X												
/. 1,1-Dichloro ylene (75-35-4)			X												
/. 1,2-Dichloro pane (78-87-5)			X												
/. 1,3 Dichloro pylene 2-75-6)			X												
/. Ethylbenzene 0-41-4)			X												
/. Methyl mide (74-83-9)			X												
/. Methyl oride (74-87-3)			X												

EPA I.D. NUMBER (copy from Item 1 of Form 1) | OUTFALL NUMBER 03

OMB No. 2000-0059
Approval expires 3-31-84

POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE (1) CONCENTRATION	a. MAXIMUM DAILY VALUE (2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	c. LONG TERM AVRG. VALUE (if available) (2) MASS	d. NO OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	a. LONG TERM AVERAGE VALUE (2) MASS	b. NO. OF ANALYSES
MS FRACTION – VOLATILE COMPOUNDS *(continued)*															
'. Methylene oride (75-09-2)			X												
'. 1,1,2,2-Tetra- roethane -34-5)			X												
'. Tetrachloro- ylene (127-18-4)			X												
'. Toluene 3-88-3)			X												
'. 1,2-Trans- roethylene 0-5)			X												
'. 1,1,1-Tri- roethane 55-6)			X												
'. 1,1,2-Tri- roethane 00-5)			X												
'. Trichloro- lene (79-01-6)			X												
'. Trichloro- romethane 69-4)			X												
'. Vinyl oride (75-01-4)			X												
MS FRACTION – ACID COMPOUNDS															
2-Chlorophenol 57-8)			X												
2,4-Dichloro- ol (120-83-2)			X												
4-Dimethyl- ol (105-67-9)			X												
4,6-Dinitro-O- ol (534-52-1)			X												
2,4-Dinitro- ol (51-28-5)			X												
2-Nitrophenol 75-5)			X												
4-Nitrophenol -02-7)			X												
P-Chloro-M- ol (59-50-7)			X												
Pentachloro- ol (87-86-5)			X												
. Phenol -95-2)			X												
2,4,6-Tri- rophenol 06-2)			X												

ONTINUED FROM THE FRONT

. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X' a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	(2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
C/MS FRACTION – BASE/NEUTRAL COMPOUNDS															
B. Acenaphthene 33-32-9)			X												
B. Acenaphtylene 208-96-8)			X												
B. Anthracene 120-12-7)			X												
B. Benzidine 92-87-5)			X												
B. Benzo *(a)* nthracene 56-55-3)			X												
B. Benzo *(a)* e (50-32-8)			X												
b. 3,4-Benzo- uoranthene 205-99-2)			X												
B. Benzo *(ghi)* erylene 191-24-2)			X												
B. Benzo *(k)* luoranthene 207-08-9)			X												
0B. Bis *(2-Chloro- hoxy)* Methane 111-91-1)			X												
1B. Bis *(2-Chloro- hyl)* Ether 111-44-4)			X												
2B. Bis *(2-Chloro- opropyl)* Ether 19638-32-9)			X												
3B. Bis *(2-Ethyl- xyl)* Phthalate 117-81-7)			X												
4B. 4-Bromo- henyl Phenyl ' ' (101-55-3)			X												
Butyl Benzyl hthalate (85-68-7)			X												
6B. 2-Chloro- aphthalene 91-58-7)			X												
7B. 4-Chloro- henyl Phenyl ther (7005-72-3)			X												
8B. Chrysene 218-01-9)			X												
9B. Dibenzo *(a,h)* nthracene 53-70-3)			X												
0B. 1,2-Dichloro- nzene (95-50-1)			X												
1B. 1,3-Dichloro- nzene (541-73-1)			X												

EPA I.D. NUMBER (copy from Item 1 of Form 1) | OUTFALL NUMBER 03

Form Approved
OMB No. 2000-0059
Approval expires 3-31-84

POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE (1) CONCENTRATION	a. MAXIMUM DAILY VALUE (2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	c. LONG TERM AVRG. VALUE (if available) (2) MASS	d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	a. LONG TERM AVERAGE VALUE (2) MASS	b. NO. OF ANALYSES
MS FRACTION — BASE/NEUTRAL COMPOUNDS *(continued)*															
1,4-Dichloro-ene (106-46-7)			X												
3,3'-Dichloro-idine 94-1)			X												
Diethyl alate 66-2)			X												
Dimethyl alate -11-3)			X												
Di-N-Butyl ate 4-2)			X												
2,4-Dinitro-ene (121-14-2)			X												
2,6-Dinitro-ene (606-20-2)			X												
Di-N-Octyl alate -84-0)			X												
1,2-Diphenyl-azine *(as Azo-ene)* (122-66-7)			X												
Fluoranthene -44-0)			X												
Fluorene 73-7)			X												
Hexa-robenzene -71-1)			X												
Hexa-butadiene 3-3)			X												
Hexachloro-opentadiene 47-4)			X												
Hexachloro-ne (67-72-1)			X												
Indeno *3-cd)* Pyrene -39-5)			X												
Isophorone 59-1)			X												
Naphthalene 20-3)			X												
Nitrobenzene 95-3)			X												
N-Nitro-methylamine 75-9)			X												
N-Nitrosodi-ropylamine -64-7)			X												

NTINUED FROM THE FRONT

POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
/MS FRACTION – BASE/NEUTRAL COMPOUNDS *(continued)*															
3. N-Nitro-iphenylamine -30-6)			X												
3. Phenanthrene -01-8)			X												
3. Pyrene 9-00-0)			X												
3. 1,2,4 - Tri-robenzene 0-82-1)			X												
/MS FRACTION – PESTICIDES															
Aldrin 9-00-2)			X												
3HC 9-84-6)			X												
β-BHC 9-85-7)			X												
γ-BHC 89-9)			X												
δ-BHC 1-86-8)			X												
Chlordane 74-9)			X												
4,4'-DDT 29-3)			X												
4,4'-DDE 55-9)			X												
4,4'-DDD 54-8)			X												
ieldrin -1)			X												
α-Endosulfan -29-7)			X												
β-Endosulfan -29-7)			X												
Endosulfan te 1-07-8)			X												
Endrin 0-8)			X												
Endrin ıyde 1-93-4)			X												
Heptachlor 4-8)			X												

CONTINUE ON PAGE V-9

NTINUED FROM PAGE V-8

EPA I.D. NUMBER (copy from Item 1 of Form 1) | OUTFALL NUMBER 03

Form Approved
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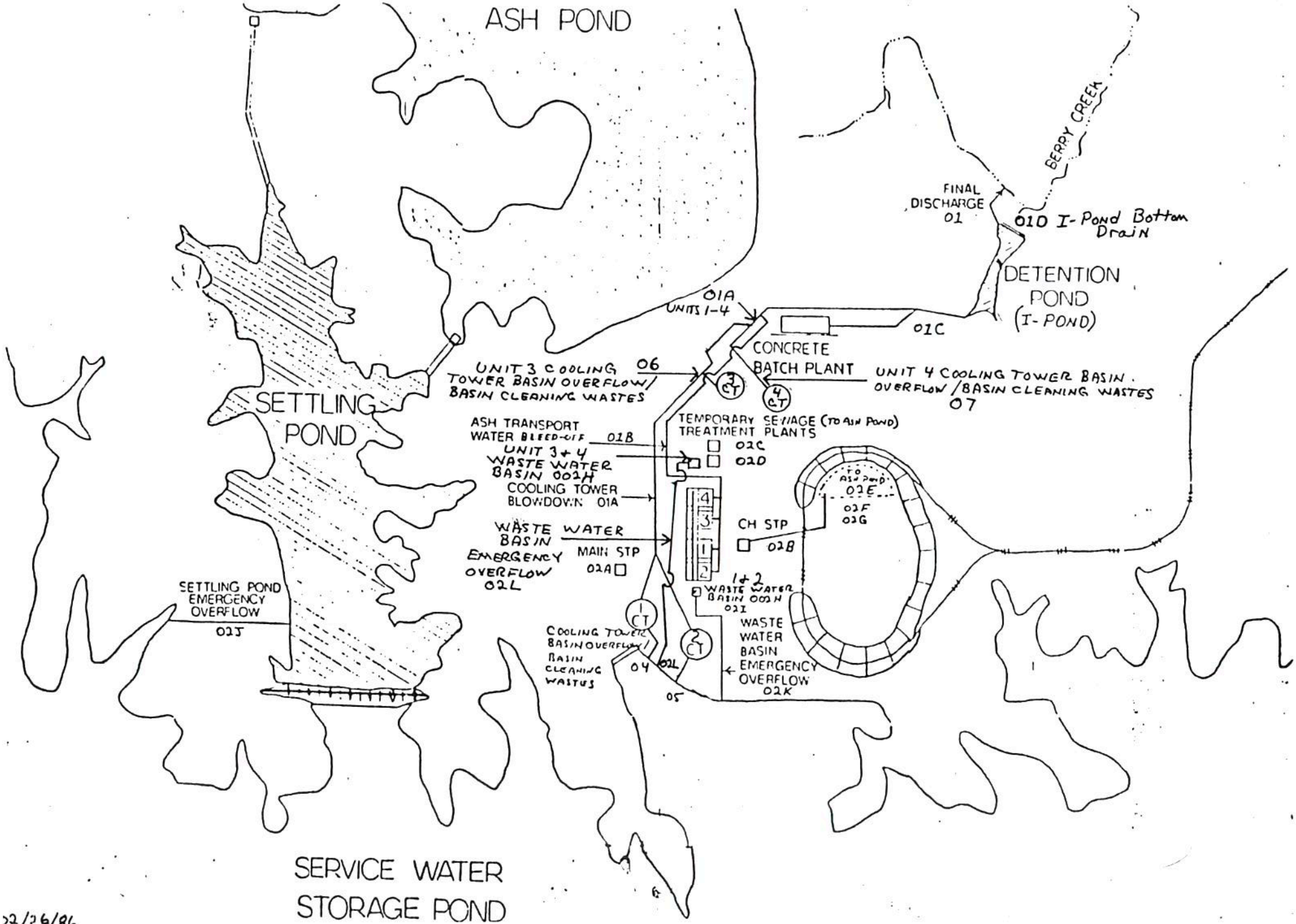
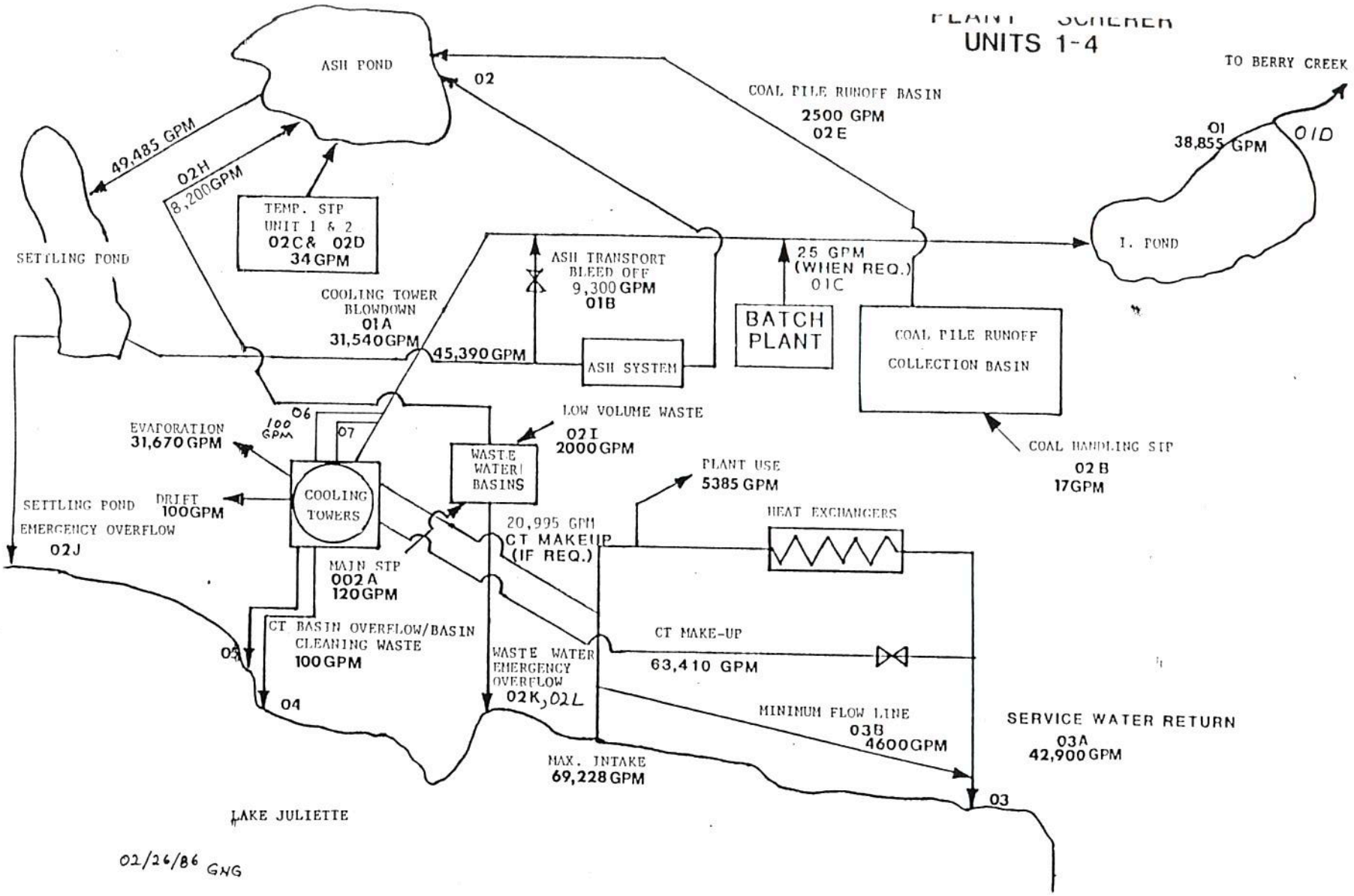
Approval expires 3-31-84

POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE (1) CONCENTRATION	a. MAXIMUM DAILY VALUE (2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	c. LONG TERM AVRG. VALUE (if available) (2) MASS	d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	a. LONG TERM AVERAGE VALUE (2) MASS	b. NO. OF ANALYSES
C/MS FRACTION – PESTICIDES *(continued)*															
P. Heptachlor oxide 024-57-3)			X												
P. PCB-1242 469-21-9)			X												
P. PCB-1254 097-69-1)			X												
P. PCB-1221 104-28-2)			X												
CB-1232 1-16-5)			X												
. PCB-1248 572-29-6)			X												
. PCB-1260 096-82-5)			X												
. PCB-1016 574-11-2)			X												
Toxaphene 01-35-2)			X												


ASH POND
BERRY CREEK
FINAL DISCHARGE 01
010 I-Pond Bottom Drain
DETENTION POND (I-POND)
01A UNITS 1-4
01C
CONCRETE BATCH PLANT
UNIT 3 COOLING TOWER BASIN OVERFLOW/ BASIN CLEANING WASTES 06
UNIT 4 COOLING TOWER BASIN OVERFLOW/BASIN CLEANING WASTES 07
SETTLING POND
ASH TRANSPORT WATER BLEED-OFF 01B
UNIT 3+4 WASTE WATER BASIN 002H
COOLING TOWER BLOWDOWN 01A
WASTE WATER BASIN EMERGENCY OVERFLOW 02L
TEMPORARY SEWAGE TREATMENT PLANTS
02C
02D
MAIN STP 02A
CH STP 02B
TO ASH POND 02E
02F
02G
1+2 WASTE WATER BASIN 002H 02I
WASTE WATER BASIN EMERGENCY OVERFLOW 02K
COOLING TOWER BASIN OVERFLOW/ BASIN CLEANING WASTES 04
02L
05
SETTLING POND EMERGENCY OVERFLOW 02J
SERVICE WATER STORAGE POND
12/16/86

PLANT SCHERER
UNITS 1-4



02/24/86 GNG

DRAFT/FINAL A/O? _____

TO WALLACE_____ DUE_____

FISCAL YEAR 1986 NPDES PERMIT REVIEW

STATE: _____

FACILITY: _____

NPDES # : _____

PRE-DRAFT_____ DRAFT_____ FINAL_____

_____NEW

_____MAJOR IND.

_____MAJOR MUN.

_____MAJOR PRI.

_____MINOR PRI.

_____INTERSTATE

_____

ROUTING: 1. LOG/DATE_____

2. ~~PATRICK~~ PKW 9/25

3. ASSIGNED TO Barbara / Lisa DUE_____

4. UNIT CHIEF (IF PROBLEMS)

5. LOG

6. PCS (FINALS) / FILE (DRAFTS)

COMMENTS:

ACTION TO BE TAKEN: _____

COMPLETED BY: _____ DATE: _____

A1-7

Georgia Department of Natural Resources

205 Butler Street, S.E., Floyd Towers East, Atlanta, Georgia 30334

J. Leonard Ledbetter, Commissioner
Harold F. Reheis, Assistant Director
Environmental Protection Division
(404) 656-4713

Patrick Vorsatz 9/19

9/25

September 16,1986

Mr. Bruce R. Barrett, Director
Water Management Division
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

RE: Georgia Power Company
Plant Scherer
NPDES Permit No. GA 0035564

Bruce

Dear Mr. Barrett:

We are responding to a letter dated July 29, 1986 from Mr. John Marlar to Mr. Jack Dozier regarding comments on the above referenced July 3, 1986 draft NPDES permit. In our meeting on August 12, 1986 we agreed that Georgia would develop a statewide strategy for controlling TRC (and other) toxicity. It was further agreed that EPA would not object to permits where TRC is a potential concern until our strategy is operable and a TRC toxicity problem has been documented.

In order to be consistent with this approach, we are withdrawing the TRC limit of 0.5 mg/l at outfall 03. Only monitoring will be required until field investigations determine the need for a water-quality based limit. This should resolve your specific objection and facilitate issuance of this permit.

Responses to your comments and recommendations follow using the sequence of Mr. Marlar's letter:

1. Outfalls 01B and 02J - Ash Transport Water
We decline to add more monitoring and certifications. Power plants are very complex facilities and we wish to simplify the NPDES permits wherever possible. The permit limits comply with the guidelines. Part I.C.1. requires representative sampling. Georgia Power has acted responsibly in the past to collect additional samples when needed and maintain all treatment units so that permits are not violated.

2. Outfall 01A-Cooling Tower Blowdown
We propose no changes to the draft requirements. A July 29, 1986 letter from Georgia Power indicates that their May 5, 1986 discussion of chlorination practices will serve as a demonstration

of the need to simultaneously chlorinate for more than 2 hours per day. This is acceptable to us and will be approved in accordance with 40CFR 423.13(d)(2). No changes to the limits or other permit modifications will be necessary. Part III.B.4. requires Georgia Power to develop an appropriate reporting format. Any biological studies or continuous TRC time and concentration monitoring can be done at the company's discretion.

3. Fact Sheet/Rationale

These comments have been incorporated where appropriate.

A copy of the revised draft permit and Georgia Powers' July 29, 1986 letter are enclosed. All objections and comments have been addressed. We intend to issue the permit in 30 days.

Sincerely,

Harold F. Reheis, P.E.
Assistant Director

HFR:ths

Enclosure

cc: Georgia Power Company

Mtg. w/ Georgia
re Scherer etc
10/8/86

Nolton Johnson
Tom Hopkins
Vos Satty
Vincent
Lisa Calhoun
CHK

Ga Power Proposes dechlorination on cooling tower (combined) with dechlorination and also on service water,
Ga EPD does not want to require Ga Power to install/use these facilities.
Issue is "Cannot" vs "does not want to"

Please attach this form on front of your new file

Margret - this is a NEW file that needs a bar code assigned and entered into the system.

Please create a file with the following information:

File I. D. # GA 0035564

File Description Plant Scherer

Series # 2053 *(Example: 0232A)*

_____ *No other volumes for this number exist/or*

__✓__ *there are other volumes for this number*

File Creation Date: M 10 *D* 6 *Y* 2008

Recipent: Karrie Jo Shell **ext** 29308

614794